

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

PAMELA G. CAPPETTA,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:08-cv-00288
)	
GC SERVICES LIMITED PARTNERSHIP,)	
)	
Defendant.)	

**DEFENDANT'S NOTICE REGARDING ITS RESPONSE TO PLAINTIFF'S
INITIAL REPORT ON STATUS OF DISCOVERY**

On June 18, 2009, Defendant filed its response to Plaintiff's Initial Report on Status of Discovery [Document 153]. In its response, Defendant referenced several discovery DVD's which were due to be overnighted to Defendant's counsel and then hand-delivered to Plaintiff's counsel on June 19, 2009. Defendant's counsel learned today that those DVD's were not picked up by Federal Express last night from Defendant's offices in Houston, Texas and, therefore, will not arrive today as represented in Defendant's response. Defendant's counsel understands the DVD's have now been delivered to Federal Express for delivery to Defendant's counsel, and should be hand delivered to Plaintiff's counsel on Monday June 22, 2009. Defendant's counsel further understands that these DVD's contain the following:

1. Debtor Detail Listings for the period April 1, 2006 through the end of that year;
2. "1221" screens;
3. Revised Debtor Detail Listings for 2007 (these are intended to replace the 2007 Debtor Detail Listings produced on June 15, 2009 which omitted portions of 2007 data and duplicated portions of 2008); and

4. A revised name, address, and date of assignment list for American Express accounts assigned to GC Services for collection since April 1, 2006 (this is intended to replace the list produced on June 8, 2009 which omitted portions of 2007 data and duplicated portions of 2008).

Respectfully submitted,

G.C. SERVICES LIMITED PARTNERSHIP

By: /s/
James C. Skilling (VSB No. 27998)
Rebecca H. Royals (VSB No. 71420)
Zev H. Antell (VSB No. 74634)
Attorneys for GC Services Limited Partnership
BUTLER, WILLIAMS & SKILLING, P.C.
100 Shockoe Slip, 4th Floor
Richmond, Virginia 23219
Telephone: (804) 648-4848
Facsimile: (804) 648-6814
E-mail: jskilling@butlerwilliams.com
rroyals@butlerwilliams.com
zantell@butlerwilliams.com

David M. Schultz (admitted *pro hac vice*)
Todd P. Stelter (admitted *pro hac vice*)
Attorney for GC Services Limited Partnership
HINSHAW & CULBERTSON LLP
222 N. LaSalle Street, Suite 300
Chicago, IL 60601-1081
Telephone: (312) 704-3000
Facsimile: (312) 704-3000
E-mail: dschultz@hinshawlaw.com
tstelter@hinshawlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June, 2009, I electronically filed the foregoing Notice with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Matthew J. Erausquin, Esquire
CONSUMER LITIGATION ASSOCIATES, P.C.
10560 Main Street, PH-15
Fairfax, Virginia 22030

Leonard A. Bennett, Esquire
CONSUMER LITIGATION ASSOCIATES, P.C.
12515 Warwick Boulevard, Suite 100
Newport News, Virginia 23606

Jason M. Krumbein, Esquire
KRUMBEIN CONSUMER LEGAL SERVICES
1650 Willow Lawn Drive, Suite 300
Richmond, Virginia 23230

Counsel for Plaintiff

/s/
Zev H. Antell (VSB No. 74634)
Attorney for GC Services Limited Partnership
BUTLER, WILLIAMS & SKILLING, P.C.
100 Shockoe Slip, 4th Floor
Richmond, Virginia 23219
Telephone: (804) 648-4848
Facsimile: (804) 648-6814
E-mail: zantell@butlerwilliams.com